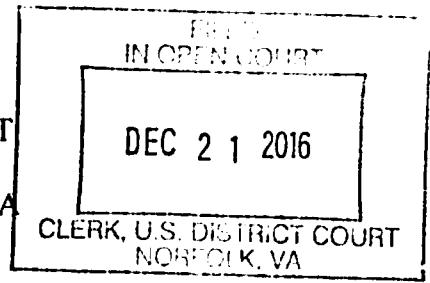


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA)
v.) CRIMINAL NO. 2:16cr 168
JONATHAN RICHARD,) 18 U.S.C. §§ 7 & 13, assimilating
Defendant.) Code of Virginia § 46.2-865.1(A)(2)
) Racing Homicide
) (Count 1)
) 18 U.S.C. §§ 7 & 13, assimilating
) Code of Virginia § 46.2-865.1(A)(1)
) Racing Maiming
) (Count 2)
) 18 U.S.C. §§ 7 & 13, assimilating
) Code of Virginia § 18.2-266
) DUI
) (Count 3)
) 18 U.S.C. §§ 7 & 13, assimilating
) Code of Virginia § 46.2-862
) Reckless Driving
) (Count 4)

INDICTMENT

December 2016 TERM - at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about the 13th day of August 2016, on board Joint Expeditionary Base Little Creek-Fort Story, in Virginia Beach, Virginia, on lands acquired for the use of the United States, within the special maritime and territorial jurisdiction thereof, in the Eastern District of Virginia, the defendant, JONATHAN RICHARD, did engage in a race between two or more motor vehicles on the highways in the Commonwealth in a manner so gross, wanton and culpable as to show a reckless disregard for human life, and in so doing caused the death of another person, to wit: W.A..

(In violation of Title 18, United States Code, Sections 7 and 13, assimilating Code of Virginia Sections 46.2-865 and 46.2-865.1(A)(2).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 13th day of August 2016, on board Joint Expeditionary Base Little Creek-Fort Story, in Virginia Beach, Virginia, on lands acquired for the use of the United States, within the special maritime and territorial jurisdiction thereof, in the Eastern District of Virginia, the defendant, JONATHAN RICHARD, did engage in a race between two or more motor vehicles on the highways in the Commonwealth in a manner so gross, wanton and culpable as to show a reckless disregard for human life, and in so doing caused serious bodily injury to another person who was not involved in the race, to wit: D.K..

(In violation of Title 18, United States Code, Sections 7 and 13, assimilating Code of Virginia Sections 46.2-865 and 46.2-865.1(A)(1).)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 13th day of August 2016, on board Joint Expeditionary Base Little Creek-Fort Story, in Virginia Beach, Virginia, on lands acquired for the use of the United States, within the special maritime and territorial jurisdiction thereof, in the Eastern District of Virginia, the defendant, JONATHAN RICHARD, did drive and operate a motor vehicle while under the influence of alcohol.

(In violation of Title 18, United States Code, Sections 7 and 13, assimilating Code of Virginia Sections 18.2-266(ii) and 18.2-270.)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 13th day of August 2016, on board Joint Expeditionary Base Little Creek-Fort Story, in Virginia Beach, Virginia, on lands acquired for the use of the United States, within the special maritime and territorial jurisdiction thereof, in the Eastern District of Virginia, the defendant, JONATHAN RICHARD, did drive a motor vehicle on the highways in the Commonwealth at a speed of twenty miles per hour or more in excess of the applicable speed limit and in excess of eighty miles per hour regardless of the applicable speed limit.

(In violation of Title 18, United States Code, Sections 7 and 13, assimilating Code of Virginia Section 46.2-862(i) and (ii).)

United States v. Jonathan Richard
Criminal No. 2:16cr168

A TRUE BILL:

Redacted

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:

James T. Cole

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